



Jacquelynn Ruff
Vice President
International Public Policy &
Regulatory Affairs

1300 I Street, N.W., Floor 400 W
Washington, DC 20005

Phones 202 515-2530
Fax 202 289-7983

February 9, 2005

Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

Re: *Ex Parte Presentation* in Reporting Requirements for U.S. Providers of
International Telecommunications Services (IB Docket No. 04-112)

Dear Ms. Dortch:

Pursuant to Section 1.1206 of the Commission rules, 47 C.F.R. § 1.206, Verizon hereby submits this letter summarizing an *ex parte* presentation by Verizon, AT&T, and Sprint yesterday, February 9, 2005, in the above-referenced docket. Doug Schoenberger, and Jim Talbot from AT&T, David Nall and Marybeth Banks from Sprint, and Leslie Owsley, Jennifer Ullman and I from Verizon met with staff of the International Bureau: Linda Blake, John Copes, Joanne Ekblad, Claudia Fox, Cathy Hsu, David Krech, Susan O'Connell, Mark Uretsky, and Peggy Reitzel.

We discussed the shared views of our companies on the NPRM on Reporting Requirements for U.S. Providers of International Telecommunications Services. The substance of the discussion is set forth in the attachment. Our companies now share the view that it would be in the public interest to eliminate the reporting requirements of Sections 43.61 and 43.82 of the Commission's rules, given the current marketplace and the balance between benefits and burdens of the reporting requirements. Sprint had not previously stated a position on the elimination of all Section 43.61 requirements, and AT&T's positions on these issues now differ from those previously provided in its comments in this docket.

Respectfully submitted,

/s/ Jacquelynn Ruff

Jacquelynn Ruff

cc: Linda Blake
John Copes
Joanne Ekblad
Claudia Fox
Cathy Hsu
David Krech
Susan O'Connell
Peggy Reitzel
Mark Uretsky

**Reporting Requirements for U.S. Providers of International
Telecommunications Services (IB Docket No. 04-112)
AT&T, Sprint, and Verizon
February 8, 2005**

- ✓ The Commission should eliminate the reporting requirements in sections 43.61 and 43.82.
 - The growing competitiveness of the U.S. market and increased liberalization of foreign markets eliminates the need for these reports.
 - Section 43.61 and 43.82 reports now provide insufficient benefits to justify reporting the huge volume of data on an annual basis.
 - U.S. carriers would continue to report international service revenues under FCC Form 499-A, which is how domestic long distance services are reported.
- ✓ If the Commission retains these reports they should be significantly streamlined, and under no circumstances should international reporting requirements be made more burdensome.
 - Devoting increasingly scarce resources to new and unproven regulatory reporting efforts is an uneconomic and unpleasant prospect.
- Several NPRM proposals further the Commission's objective of simplifying international reporting requirements consistent with changes in the international marketplace and should be adopted.
 - Eliminate the current requirement to report number of messages.
 - Eliminate the current requirement to separately report data for off-shore points.
 - Section 43.61 and 43.82 reports should be consolidated into a single report.
- There is agreement among the commenters that proposals for new requirements would be unnecessarily burdensome and require unwarranted changes in reporting systems not commensurate with any regulatory benefit for the competitive international services market. These proposals should not be adopted.
 - Separately reporting retail and wholesale information.
 - Reporting non-route specific revenues.
 - Separate reporting for US carrier country direct/country-beyond services.
 - Separate reporting to divide IMTS traffic between "traditional settlements" and "other" categories.

- The NPRM seeks comment on other potential changes to the reporting requirements.
 - Quarterly traffic and revenue reports for large carriers should be eliminated. (43.61(b))
 - Quarterly reports by switched resale carriers affiliated with dominant carriers should be removed. (43.61(c))
 - Reporting requirements for CMRS providers offering international services via resale should be eliminated. (43.61(a))
 - Carrier-specific circuit status data is competitively sensitive and properly treated as confidential.
- ✓ This docket provides an excellent opportunity for the Commission to modify its reporting requirements to reflect the changes in the international services marketplace. However, the Commission should carefully weigh the benefits of adopting any proposals that require greater and unprecedented detail against the significant burden in terms of staffing and financial resources required by U.S. carriers to gather and analyze the requested data.